

**UNITED STATES COURT OF APPEALS FOR THE
FOURTH CIRCUIT**

JOANN HAYSBERT)
Plaintiff-Appellant,)
Case No. 25-1332
v.)
OUTBACK STEAKHOUSE)
OF FLORIDA, LLC)
Defendant-Appellee)

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT'S REPLY BRIEF**

Plaintiff-Appellant JoAnn Wright Haysbert hereby requests a one-week extension of the deadline to file her reply brief in the above-captioned appeal.

Defendant-Appellee sought, and was granted, an extension until September 15, 2025 of the deadline to file its responsive brief. *See* Docs. 41, 42. Appellant's reply brief is due twenty-one days later, Doc. 42, which is October 6, 2025. If the instant motion is granted, because October 13, 2025 is Columbus Day, the deadline for Appellant's reply brief would be October 14, 2025. *See* Fed. R. App. P. 26(a)(1)(C), (a)(6)(A).

The Federal Rules of Appellate Procedure permit a deadline to be extended for “good cause.” Fed. R. App. P. 26(b).

Good cause exists to grant the requested extension. This extension is sought to permit counsel for Appellant to provide the Court with a reply brief that properly addresses the extensive, fact-intensive arguments in Appellee's brief, and to accommodate counsel's unexpected professional and personal obligations, as well as observance of the Jewish High Holidays.¹ Neither party will suffer prejudice from this extension.

Appellant has not previously been granted an extension in this appeal. Appellant's only previous request for an extension sought to allow the Court and the district court, respectively, to address then-pending motions to intervene and to supplement the record, *see* Doc. 33, and was administratively terminated by the Court, *see* text of Dkt. 34.

Counsel for Defendant-Appellee consents to the granting of this motion, including the specific extension of time requested.

Wherefore, Plaintiff-Appellant JoAnn Wright Haysbert respectfully requests that the Court extend the deadline for Appellant's reply brief to October 14, 2025.

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¹ Rosh Hashanah, the Jewish New Year, was observed from the evening of September 22nd through September 24th. Yom Kippur, the Day of Atonement, will be observed beginning this evening, October 1st, through tomorrow, October 2nd.

DATED: October 1, 2025

Respectfully submitted,

/s/ Judah J. Ariel _____

Judah J. Ariel

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